

UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF NEW HAMPSHIRE

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Laurie Ortolano

v.

The City of Nashua, et al.

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Civil Action No. 22-cv-00326-LM

**DEFENDANTS CITY OF NASHUA, FRANK LOMBARDI AND MICHAEL  
CARIGNAN'S ASSENTED-TO MOTION TO EXTEND TIME FOR FILING REPLIES  
TO OBJECTIONS TO MOTION FOR SUMMARY JUDGMENT**

Defendants City of Nashua, Frank Lombardi and Michael Carignan bring the within assented-to motion to extend the time to file their Replies to Plaintiff's Objections [Doc. Nos. 99, 104 and 105] to their respective Motions for Summary Judgment [Doc. Nos. 84, 87 and 88], pursuant to L.R. 7.2(a), and as grounds therefore states as follows:

1. Defendants filed their Motion for Summary Judgment on May 28 and May, 31, 2024. [Doc. No. 84, 87 and 88].
2. Plaintiff filed her Objections on June 28, 2024 [Doc. No. 99] and July 1, 2024 [Doc. Nos. 104 and 105].
3. Replies are therefore due on or before July 5, 2024 and July 8, 2024. (L.R. 7.1(e)(1)).
4. Defendants seek a brief extension until July 11, 2024, to file their Replies due to the upcoming Fourth of July holiday weekend and undersigned counsel's vacation over that time frame.
5. Counsel for Plaintiff assents to the requested extension.

6. Pursuant to L.R. 7.2(a), the extension will not result in the continuance of any hearing, conference or trial dates.

7. A memo of law is not required as the Court has discretion to grant the requested relief.

WHEREFORE, Defendants City of Nashua, Frank Lombardi and Michael Carignan respectfully requests this Honorable Court:

- A. Grant the within motion;
- B. Extend their Reply deadlines to on or before July 11, 2024; and
- C. Grant such further relief as justice requires.

Respectfully submitted,

**THE CITY OF NASHUA,  
FRANK LOMBARID and  
MICHAEL CARIGNAN**

By their attorneys

CULLEN COLLIMORE SHIRLEY PLLC

Dated: July 3, 2024

By: /s/ Brian J.S. Cullen

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**CERTIFICATE OF SERVICE**

I certify that a copy of this filing was served via the Court's ECF filing system upon counsel of record.

Dated: July 3, 2024

By: /s/ Brian J.S. Cullen

Brian J.S. Cullen